



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION,
PESTICIDES
AND TOXIC
SUBSTANCES

May 1, 2009

DP BARCODE: D362060

MRID: 47670201, 47670202, 47670203, 47670204,
47670205, 47670206, 47670207, 47670208,
47670209, 47670210, 47670211

SUBJECT: Gattuso GP

REG. NO. OR FILE SYMBOL: 777-RNI

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use [] OR End-use Product [X]

INGREDIENTS (PC Codes): 021801

CAS Number: 77-92-9

TEST LAB: Reckitt Benckiser Inc.

SUBMITTER: Reckitt Benckiser Inc.

GUIDELINE: 830 Guidelines

COMMODITIES: Formulation

REVIEWER: Chris Jiang CJ

ORGANIZATION: AD

APPROVER: Karen P. Hicks

APPROVED DATE: 5/1/09



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MEMORANDUM

Subject: Review for 777-RNI

From: Chris Jiang, Chemist
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

Thru: Karen P. Hicks, CT Team Leader
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

Thru: Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510P)

To: Tracy Lantz PM 34\Stacey Grigsby
Regulatory Management Branch II
Antimicrobials Division (7510P)

Applicant: Reckitt Benckiser Inc.

Chris Jiang
5/1/09

Chris Jiang
for KPH 5/1/09

Formulation from Label

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
Citric acid	3.5 %
<u>Other Ingredients</u>	96.5 %
Total	100.0 %

BACKGROUND:

The registrant has submitted a product chemistry package in support of a new registration of an end-use product to be used as a cleaner. The package includes a label, Confidential Statements of Formula (CSFs) for the basic formulation (formula 1262-144A) and alternate formulas 1333-117A, 1333-117B, 1333-117C, and 830 Guidelines that have been identified by the Agency as MRIDs 47670201, 47670202, 47670203, 47670204, 47670205, 47670206, 47670207, 47670208, 47670209, 47670210, and 47670211.

FINDINGS:

1. The concentration of the active ingredient on the Confidential Statements of Formula (CSFs dated February 05, 2009) is consistent with the label declaration. These CSFs supersede all previous CSFs for the respective formulations.
2. The product identity and composition is **acceptable**.
3. The descriptions of the starting materials and the formulation process are **acceptable**.
4. The discussion of the formation of impurities is **acceptable**.
5. The preliminary analysis is **acceptable**.
6. All certified limits are **acceptable**.
7. The enforcement analytical method is **acceptable**.
8. The submittal of samples is **acceptable**.
9. The color, physical state, and odor are **acceptable** as the product is a colorless liquid with a "Spring Waterfall" odor at 22 °C.
10. The density is **acceptable** as the mean density was determined to be 1.022 g/mL (8.5 lbs/gal) at 20.0 °C.
11. The pH is **acceptable** as the pH was determined to be 1.77 at 23 °C.
12. The oxidation/reduction potential is **acceptable** as no violent reaction occurred when the product was mixed with water, monoammonium phosphate, zinc, potassium permanganate, and turpentine.
13. The flammability is **acceptable** as the product had a flash point that is greater than 215 °F (102 °C)

14. The explodability is **acceptable** as the product is not potentially explosive.
15. A joint study for storage stability and corrosion characteristics is ongoing.
16. The viscosity is **acceptable** as it was determined to be 2.13 cPs at 22 °C.
17. The miscibility is **acceptable** as the product is not an emulsion.
18. The dielectric breakdown voltage is **acceptable** as the product is not intended for use around electrical equipment.

CONCLUSIONS:

Product Science Branch of Antimicrobials Division finds the submission for 777-RNI to be acceptable.